

EXHIBIT 1

THE HONORABLE THOMAS S. ZILLY
THE HONORABLE S. KATE VAUGHAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ECHOTA C. WOLFCLAN, on behalf of
himself and other similarly situated
individuals,

Plaintiffs,

v.

PIERCE COUNTY, et al.,

Defendants

Case No. 23-cv-5399-TSZ-SKV

**PLAINTIFF ECHOTA WOLFCLAN'S
FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO
DEFENDANTS**

TO: Pierce County, et al., Defendants

Pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure, Plaintiff Echota Wolfclan ("Plaintiff") hereby requests that Defendants Pierce County, et al ("Defendants") respond to the following Interrogatories and Requests for Production within thirty (30) days from date of service.

DEFINITIONS AND INSTRUCTIONS

For purposes of these Requests, the following definitions shall apply.

1. "Document" is used in the broadest sense contemplated by Federal Rule of Civil Procedure 34, and includes, but is not limited to, the following items: agreements; drafts;

PLAINTIFF ECHOTA WOLFCLAN'S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANTS

(23-cv-5399-TSZ-SKV) - 1

123454773.1 0099820-01207

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Telephone 206.624.0900

1 communications; correspondence of any kind, including, but not limited to, text messages, instant
2 messages, WhatsApp messages, Discord messages, Zoom messages, Microsoft Teams messages,
3 e-mails, telegrams, cables, and facsimiles; memoranda; records; books; financial statements;
4 summaries of records or notes of personal conversations or interview; diaries; calendars; forecasts;
5 statistical statements; accountants work papers; graphs; charts; maps; diagrams; blue prints; tables;
6 indexes; pictures; recordings; tapes; microfilm; charge clips; accounts; analytical records; minutes
7 or records of meetings or conferences; reports and/or summaries of investigations; opinions or
8 reports of consultants; appraisals; reports and/or summaries of negotiations; brochures; pamphlets;
9 circulars; trade letters; press releases; contracts; stenographic, handwritten or any other notes;
10 projections; working papers; federal and state income tax returns; checks, front and back; check
11 stubs or receipts; shipping documents; manifests; invoice vouchers; computer printouts and
12 computer disks and tapes; and tape data sheets or data processing cards or disks or any other written,
13 recorded, transcribed, punched, taped, filmed or graphic matters; however produced or reproduced.

14 2. "Communication" includes every manner of transmitting or receiving facts,
15 information, opinions, or thoughts from one person to another person, whether orally, by
16 documents, writing, e-mail, or copy thereof, and to words transmitted by telephone, radio, or any
17 method of voice recording.

18 3. "Identify" or "describe" means the following:

19 a. When used in connection with natural persons, "identify" or "describe" means
20 to state the person's full name, present business address and telephone number,
21 present home address, and city of residence as well as the substance of the
22 person's knowledge, where such knowledge was obtained, whether such
23 knowledge was discussed with you, when such discussions occurred, who
24 participated in such discussions, and the substance of all discussions.

25 b. When used in connection with an entity, "identify" or "describe" means to state
26 the entity's full name, last known address(es), telephone number, and

1 organization form (e.g., corporation, sole proprietorship, partnership, joint
2 venture, etc.).

3 c. When used in connection with an act, “identify” or “describe” means to provide
4 a description of the act, including the place, date, and time of its occurrence,
5 and the persons and/or entities engaged in the act.

6 d. When used in connection with documents, “identify” or “describe” means to
7 state the nature of the document (e.g., memorandum, letter, notes, etc.), its
8 author(s), its addressee(s) or recipient(s), its title or subject matter, and given to
9 it at the time of production. If the document has not been produced, then
10 Plaintiff requests that it be produced, pursuant to Civil Rule 34, along with
11 Defendant’s response to these Interrogatories.

12 e. When used in connection with an oral communication, “identify” or “describe”
13 means to state the time, date, place, and means of the oral communication (e.g.,
14 telephone, personal meeting, etc.), the identity of all persons participating in the
15 oral communication, the identity of persons hearing the oral communication,
16 and a detailed description of the oral communication.

17 4. “Plaintiff” means Echota Wolfclan (f/k/a Justin Allen Davey) and any of his agents
18 or representatives, including his current and former attorneys.

19 5. “Defendants” or “Defendant” means each separately named defendant in this
20 lawsuit, including individuals and entities, and any of its/his/her agents or representatives,
21 including its/his/her current/former attorney(s).

22 6. “Jail” means Pierce County Jail at 910 Tacoma Ave. S., Tacoma, WA 98402.

23 7. “Incarceration” or “Incarcerated” means any individual who was detained for any
24 amount of time at Pierce County Jail, whether pre- or post- conviction, for any period of time.

25 8. “Related to” or “relating to” shall mean directly or indirectly supporting,
26 evidencing, describing, mentioning, referring to, contradicting, comprising or concerning.

PLAINTIFF ECHOTA WOLFCLAN’S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANTS

(23-cv-5399-TSZ-SKV) - 3

123454773.1 0099820-01207

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1 9. “And” or “or” shall be construed conjunctively or disjunctively as necessary to
2 make the requests inclusive rather than exclusive.

3 10. The use of the word “including” shall be construed to mean “without limitation”
4 and without implication of exclusion of any relevant terms or examples not explicitly listed.

5 11. Reference to the singular in any of these requests shall also include a reference to
6 the plural, and reference to the plural shall include a reference to the singular.

7 12. Unless otherwise stated, the relevant time period for all Interrogatories and
8 Requests for Production is January 1, 2012 through Present.

9 13. In answering these Interrogatories, Plaintiff shall furnish all information known or
10 available. If any of these Interrogatories cannot be answered in full, the interrogatory shall be
11 answered to the extent possible.

12 14. These Requests for Production seek electronically stored information (“ESI”).
13 Produce all ESI in native format, and produce within the folders and subfolders that the file was
14 found. Alternatively, the native files may be converted to TIFF files, with full-text OCR, and
15 include an Opticon and .dat load files—so long as the image documents are produced with
16 corresponding metadata in a comma delimited CSV (including, but not limited to, BegDoc#,
17 EndDoc#, PgCount, To, From, CC, BCC, Author, DateSent, DateCrtd, DateRcvd, DocTitle,
18 Subject, Parentid, Custodian, File-Path) or a link to the associated native file. Emails must be
19 produced preserving the local time. Nonprintable or nonconvertible files (e.g., excel files,
20 PowerPoint files, financial reports, CAD Files, video files, and sound files) must be produced in
21 native format. The documents shall be produced as they are kept in the usual course of business or
22 shall be organized and labeled to correspond to the categories of requests. File folders with tabs or
23 labels identifying documents requested must be produced intact with the documents. Selection of
24 documents from the files and other sources and the numbering of any documents shall be
25 performed in a manner that ensures that the source (custodian and file) of each document may be
26 determined if necessary. Documents attached to each other should not be separated. Unless

PLAINTIFF ECHOTA WOLFCLAN’S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANTS

(23-cv-5399-TSZ-SKV) - 4

123454773.1 0099820-01207

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1 otherwise agreed to by the Parties, production of ESI should comply with the United States District
2 Court for the Western District of Washington's Model Agreement Regarding Discovery of
3 Electronically Stored Information.

4 15. In the event you assert any form of objection or privilege as a ground for not
5 answering an interrogatory or any part of an interrogatory, please set forth the legal grounds and
6 facts upon which the objection or privilege is based. If the objection relates to only part of the
7 interrogatory, the balance of the interrogatory should be answered in full.

8 16. All documents shall be produced as they are maintained in the ordinary course of
9 business, and shall be produced in their original folders, binders, covers, or containers, or facsimile
10 thereof. For example, documents maintained electronically shall be produced in the manner in
11 which such documents are restored and retrieved.

12 17. The duty to produce documents shall not be limited or affected by the fact that the
13 same document is available through another source. All documents should be produced which are
14 not subject to an objection and are known by, possessed or controlled by, or available to
15 Defendants or any of its attorneys, consultants, representatives, employees, officers, directors,
16 partners, or other agents.

17 18. For any information withheld on the basis of a claim of privilege, identify the
18 privileged information, the person(s) who possess or who have shared the information and such
19 other facts, including but not limited to the nature of the information that supports your claim of
20 privilege. Plaintiff shall provide, at the time responses are due hereunder, a statement setting forth
21 as to each such document the following information:

- 22 a. the name(s) of the sender(s) of the document;
23 b. the name(s) of the author(s) of the document;
24 c. the name(s) of the Person(s) to whom the document or copies were sent;
25 d. the date of the document;
26 e. a brief description of the nature and subject matter of the document; and

PLAINTIFF ECHOTA WOLFCLAN'S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANTS

(23-cv-5399-TSZ-SKV) - 5

123454773.1 0099820-01207

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1 f. the nature of the privilege or the authority which is claimed to give rise to it.

2 19. Should you obtain any other documents or information which would supplement or
3 modify the documents or information supplied by you in response to this request, you are directed,
4 pursuant to Federal Rule of Civil Procedure 26(e), to give timely notice of such documents and
5 information and to furnish the additional documents or information to Plaintiff without delay.

6 **INTERROGATORIES**

7 **INTERROGATORY NO. 1:** Describe each individual Defendant's work history from
8 2012 to Present, including, but not limited to each employer, job title, business address, immediate
9 supervisor, dates of employment, compensation, and reason(s) for leaving.

10 **ANSWER:**
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13 **INTERROGATORY NO. 2:** Identify all individuals who have been employed or
14 contracted to perform maintenance of toilets or plumbing at Pierce County Jail since 2012,
15 including whether the individual is directly employed by Pierce County or is a contractor. For
16 contracted individuals, identify the name and address of his/her employer. For each individual
17 listed, whether employee or contractor, include the full name and dates he/she worked at Pierce
18 County Jail.

19 **ANSWER:**
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22 **INTERROGATORY NO. 3:** Identify all individuals who have been employed or
23 contracted to perform maintenance of grievance kiosk systems at Pierce County Jail since 2012,
24 including whether the individual is directly employed by Pierce County or is a contractor. For
25 contracted individuals, identify the name and address of his/her employer. For each individual
26

1 listed, whether employee or contractor, include the full name and dates he/she worked at Pierce
2 County Jail.

3 **ANSWER:**

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6 **INTERROGATORY NO. 4:** Describe the policy and/or procedure that Pierce County
7 Jail has in place to address when a correctional officer or any other employee receives a complaint
8 from an inmate regarding sanitation conditions in a cell, including but not limited to complaints
9 about plumbing, toilets, sewage, and/or unsanitary living conditions. Include any change(s) in
10 policy that has occurred, including but not limited to during and in response to the COVID-19
11 pandemic.

12 **ANSWER:**

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15 **INTERROGATORY NO. 5:** Identify each documented instance that an inmate,
16 including but not limited to Plaintiff, has complained about unsanitary living conditions, including
17 complaints about plumbing, sewage, and/or the toilets at Pierce County Jail, whether by formal
18 grievance or otherwise, at any point since 2012 to Present.

19 **ANSWER:**

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22 **INTERROGATORY NO. 6:** Identify each employee who has worked in any capacity
23 with inmates housed in the Mental Health Unit(s), including Unit 3 North A, of the Pierce County
24 Jail, including but not limited to Correctional Officers and/or guards, psychiatrists, and other
25 Mental Health staff (e.g. "MHP"), since 2012 to Present. For each, include the individual's full
26 name, job title, duties and responsibilities, immediate supervisor, and dates of employment.

1 **ANSWER:**

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4 **INTERROGATORY NO. 7:** Identify and describe each instance in which any portion of
5 the plumbing at Pierce County Jail has been inspected, repaired, or replaced since 1985 to Present.

6 **ANSWER:**

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9 **INTERROGATORY NO. 8:** Identify how many inmates have been housed in the area
10 that is currently known as Unit 3 North A from 2012 to Present.

11 **ANSWER:**

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14 **INTERROGATORY NO. 9:** Identify and describe any and all studies and/or cost
15 estimates that have been provided to Pierce County and/or Pierce County Jail since 1985 to Present
16 regarding the plumbing and/or toilets at Pierce County Jail. For each, describe the anticipated cost
17 of replacing the toilets and/or plumbing, the decision that was made regarding whether to replace
18 the toilets and/or plumbing, why the decision was made, and who made the decision.

19 **ANSWER:**

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22 **INTERROGATORY NO. 10:** Identify and describe all policies regarding the cleaning
23 of cells in Pierce County Jail, including the process by which an inmate can request and receive
24 cleaning supplies for his or her cell, the hours the supplies are available, whether supervision is
25 required while an inmate uses the supplies, when and for what reason cleaning supplies may be
26 denied, and whether the process for obtaining and/or the availability of cleaning supplies differs

1 between various units in the Jail, and if so, describe the differences and reasons for those
2 differences.

3 **ANSWER:**

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6 **INTERROGATORY NO. 11:** Identify and describe each instance that an inmate,
7 including but not limited to Plaintiff, was denied the ability to submit a grievance about unsanitary
8 living conditions at Pierce County Jail from 2012 to Present. For each instance, describe the reason
9 for the denial and what, if any, alternative option for filing a grievance was provided to the inmate.

10 **ANSWER:**

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13 **INTERROGATORY NO. 12:** Identify the factual basis for Defendants' denial of
14 Paragraph 60 to Plaintiff's Amended Complaint (Dkt. 107), filed May 10, 2024, and Defendant's
15 contention that "Plaintiff misrepresents a 2014[] engineering report regarding water closet
16 placement," as stated in Defendant's proposed Joint Status Report and Discovery Plan.

17 **ANSWER:**

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20 **INTERROGATORY NO. 13:** Identify the factual basis for each of Defendants' pleaded
21 affirmative defenses, as stated on pages 13 through 14 of their Answer (Dkt. 107), filed May 10,
22 2024.

23 **ANSWER:**

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26 **INTERROGATORY NO. 14:** Identify all individuals who have been housed in a cell in

Pierce County Jail Cell Block 3 North A from April 4, 2023, to Present. For each, include the individual's full name, inmate number, and dates of incarceration at the Pierce County Jail.

ANSWER:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 1.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 2.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 3.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Produce all documents and communications relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 4.

RESPONSE:

1 **REQUEST FOR PRODUCTION NO. 5:** Produce all documents and communications
2 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 5.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 6:** Produce all documents and communications
7 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 6.

8 **RESPONSE:**
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11 **REQUEST FOR PRODUCTION NO. 7:** Produce all documents and communications
12 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 7.

13 **RESPONSE:**
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16 **REQUEST FOR PRODUCTION NO. 8:** Produce all documents and communications
17 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 8.

18 **RESPONSE:**
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21 **REQUEST FOR PRODUCTION NO. 9:** Produce all documents and communications
22 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 9.

23 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 10:** Produce all documents and communications
2 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 10.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 11:** Produce all documents and communications
7 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 11.

8 **RESPONSE:**
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11 **REQUEST FOR PRODUCTION NO. 12:** Produce all documents and communications
12 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 12.

13 **RESPONSE:**
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16 **REQUEST FOR PRODUCTION NO. 13:** Produce all documents and communications
17 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 13.

18 **RESPONSE:**
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21 **REQUEST FOR PRODUCTION NO. 14:** Produce all documents and communications
22 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 14.

23 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 15:** Produce all documents and communications
2 between Defendants and any inmates or employees of Pierce County Jail related to issues of
3 backflow of toilets, plumbing, sanitation, maintenance or inspection of the same, and/or
4 complaints thereof, including submitted grievances or requests to file grievances, from 2012 to
5 Present.

6 **RESPONSE:**
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9 **REQUEST FOR PRODUCTION NO. 16:** Produce all documents and communications
10 related to Grievance 554280, Grievance 530542, or any other grievance filed by Plaintiff or any
11 other inmate related to sewage, backflow of toilets, sanitation issues, and/or maintenance of the
12 same, from 2012 to Present.

13 **RESPONSE:**
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16 **REQUEST FOR PRODUCTION NO. 17:** Produce documents (including but not limited
17 to shift schedules or time sheets) sufficient to show which correctional officers and/or other
18 officers or guards or other employees were assigned to work in the 3 North A Unit of Pierce County
19 Jail each day from 2012 to Present.

20 **RESPONSE:**
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23 **REQUEST FOR PRODUCTION NO. 18:** Produce all records related to Plaintiff,
24 including but not limited to, disciplinary, medical, grievances, commissary, and/or any other
25 records related to Plaintiff from any period in which he was detained at Pierce County Jail.

26 **RESPONSE:**

PLAINTIFF ECHOTA WOLFCLAN'S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANTS

(23-cv-5399-TSZ-SKV) - 13

123454773.1 0099820-01207

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1 **REQUEST FOR PRODUCTION NO. 19:** Produce a map or layout of Pierce County
2 Jail that shows all of the units, cells, and locations of each toilet.

3 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 20:** Produce all documents and communications
7 related to the design, installation, maintenance, inspection, and/or replacement of any portion of
8 the plumbing at Pierce County Jail since 1985 to Present.

9 **RESPONSE:**
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12 **REQUEST FOR PRODUCTION NO. 21:** Produce all documents and communications
13 related to the backflow of toilets, sewage issues, sanitation issues, or the living or working
14 conditions created thereby, at Pierce County Jail since 2012 to Present.

15 **RESPONSE:**
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18 **REQUEST FOR PRODUCTION NO. 22:** Provide all documents and communications
19 related to the two lawsuits filed in 2012 against Pierce County regarding toilet issues at Pierce
20 County Jail (*Meyer-Clemmons v. Karr*, No. C11-5603-RBL-JRC, 2012 WL 709596 (W.D. Wash.
21 Feb. 3, 2012); *Steele v. Kerr*, No. C11-5793-BHS-JRC, 2012 WL 710096 (W.D. Wash. Jan. 31,
22 2012)).

23 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 23:** Provide all documents and communications
2 related to the plumber “Jason” who was sent to Plaintiff’s cell to snake his toilet on or around
3 December 18, 2020.

4 **RESPONSE:**
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7 **REQUEST FOR PRODUCTION NO. 24:** Produce all documents and communications
8 between Ms. or Mrs. Herbison, who upon information and belief was an Officer or Cluster Officer
9 in 2021, and any inmates or employees of Pierce County Jail related to sewage issues, toilet
10 backflow issues, sanitation issues, and maintenance regarding the same, from 2012 to Present.

11 **RESPONSE:**
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14 **REQUEST FOR PRODUCTION NO. 25:** Provide all documents and communications
15 related to Plaintiff’s transfer to or from any unit and/or any cell within a unit in Pierce County Jail
16 between April 4, 2022 and Present.

17 **RESPONSE:**
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20 **REQUEST FOR PRODUCTION NO. 26:** Provide all documents and communications
21 related to any discipline or disciplinary proceeding to which Plaintiff was subject at any point
22 during any incarceration in Pierce County Jail.

23 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 27:** Provide all documents and communications
2 related to any discipline or disciplinary proceeding to which any detainee or inmate was subject at
3 any point while detained or incarcerated at Pierce County Jail in any way related to cleaning
4 supplies (or lack thereof), plumbing issues, toilet backflow or other malfunction, or
5 complaints/grievances, whether formal or informal, made about any of the aforementioned topics.

6 **RESPONSE:**
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9 **REQUEST FOR PRODUCTION NO. 28:** Provide any report, summary, or other
10 document regarding whether any aspect of the plumbing at Pierce County Jail (or portion thereof)
11 is compliant with any applicable regulation, code, ordinance, or other legal requirement.

12 **RESPONSE:**
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16 **REQUEST FOR PRODUCTION NO. 29:** Provide all documents and communications
17 related either to (1) any report, summary, or other document any report, summary, or other
18 document regarding whether any aspect of the plumbing at Pierce County Jail (or portion thereof)
19 is compliant with any applicable regulation, code, ordinance, or other legal requirement, or (2) the
20 preparation or drafting of any such report, summary, or other document.

21 **RESPONSE:**
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24 **REQUEST FOR PRODUCTION NO. 30:** Provide a copy of any transcript and/or audio
25 recording of Plaintiff Wolfclan's telephone calls from April 4, 2023 to August 15, 2023.

26 **RESPONSE:**

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2 **REQUEST FOR PRODUCTION NO. 31:** Provide a copy of all documents and
3 communications related to the inspection of Cell Block 3 North A on or around April 26, 2023.

4 **RESPONSE:**
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7 **REQUEST FOR PRODUCTION NO. 32:** Provide a copy of all documents and
8 communications referencing or related to the October 1, 2014, Main Jail Water Closet
9 Replacement Pre-Design report created by Hultz BHU Consulting Engineers, Inc.

10 **RESPONSE:**
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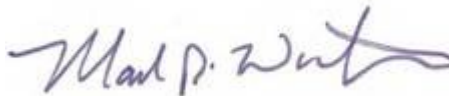
1 DATED: May 30, 2024.

2 STOEL RIVES LLP

3
4 s/ Scott Pritchard

5 J. Scott Pritchard, WSBA No. 50761
6 Michael P. Rubin, WSBA No. 59598
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Attorneys for Plaintiff Echota Wolfclan

CERTIFICATE OF SERVICE

I, Kristy Harris, hereby certify that at all times mentioned herein, I was and am a resident of the state of Washington, over the age of eighteen years, not a party to the proceeding or interested therein, and competent to be a witness therein. My business address is that of Stoel Rives LLP, 600 University Street, Suite 3600, Seattle, Washington 98101.

On May 30, 2024, I caused a true and correct copy of the foregoing document to be served upon the following counsel of record in the manner indicated below:

Frank Cornelius, WSBA No. 29590
Jana Hartman, WSBA No. 35524
Pierce County Prosecuting Attorney's Office (Civil)
Civil Division
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Tacoma, WA 98402-2160
P: 253-798-6514
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Email: frank.cornelius@piercecountywa.gov
jana.hartman@piercecountywa.gov

☐ hand delivery
☐ facsimile transmission
☐ overnight delivery
☒ first class mail
☒ e-mail delivery

Attorneys for Defendants

Executed this 30th day of May 2024 at Seattle, WA.

/s/Kristy Harris

Kristy Harris, Practice Assistant
STOEL RIVES, LLP
Kristy.harris@stoel.com